



21st Floor
1251 Avenue of the Americas
New York, NY 10020-1104

Scott M. Cooper
212-603-6478 tel

scottcooper@dwt.com

MEMO ENDORSED


January 29, 2021

VIA ECF

Hon. Edgardo Ramos
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

The parties will be referred to the magistrate judge in a separate order. All discovery deadlines are hereby stayed. If the parties do not reach an agreement at the settlement conference, they must submit a revised discovery schedule to the Court within two days of the conference. The Clerk of Court is respectfully directed to terminate the motions. Docs. 26 and 27.

So ordered.



Edgardo Ramos, U.S.D.J.
Dated: 2/2/2021
New York, New York

Re: Calixto et al. v. Crain Communications, Inc. et al., Case No. 19-cv-9318 (ER)(OTW)

Dear Judge Ramos:

As counsel for defendants Crain Communications, Inc., Nikki Kallek, and Nikki Pirrello, we write to respectfully request – on a joint basis, along with counsel for all other parties in the case – that Your Honor refer the above-referenced case to Magistrate Judge Wang for a settlement conference. The parties have already made progress toward a settlement, and are hopeful that with Magistrate Judge Wang's assistance, we will be able to resolve the case without further litigation.

Relatedly, the parties respectfully request a stay of all existing discovery deadlines, pending the outcome of the proposed settlement conference. We propose that in the event that the settlement conference is unsuccessful, the parties will have 14 days from the date of the settlement conference to prepare and submit a new proposed discovery schedule to the Court.

The parties have not previously requested any extensions of discovery deadlines. The current deadlines, as ordered by Your Honor on September 15, 2020, are:

- Further interrogatories to be served by: February 15
- Requests to Admit, if any, to be served by: February 15
- Non-expert depositions to be completed by: March 15
- Expert reports to be served by: April 30
- Rebuttal expert reports to be served by: May 31

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- Expert depositions to be completed by: June 30
- All discovery to be completed by: July 12

Thank you for your consideration.

Respectfully,

/s/ Scott M. Cooper